

Sullivan & Worcester LLP 1290 Avenue of the Americas New York, NY 10104

T 212 660 3000 F 212 660 3001 www.sandw.com

MEMO ENDORSED

Direct line: 212 660 2042 mstein@sandw.com

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June 17, 2005

By Fax: 212-805-7930

Honorable James C. Francis IV United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1960 New York, New York 10007-1312

American Steamship Owners Mutual Protection and Indemnity Association, Inc. v. Re: Alcoa Steamship Co., Inc., et al., No 04 Civ. 04309 (LAK) (JCF)

Dear Magistrate Judge Francis:

We represent the plaintiff (the "American Club") in the above-referenced action. We write to request a modest extension, until next Wednesday, June 22, 2005, of the time to file our reply papers in support of a pending discovery motion. We filed the motion on May 27, 2005. Pursuant to your memo-endorsed order filed May 12, 2005, our reply is currently due today. The next status conference in this matter is scheduled for July 6, 2005.

We seek this short extension to respond to defendants' voluminous opposition served last Friday evening. All counsel who filed papers in opposition to our motion have consented to the proposed extension.

Application granted, 50 ORDERED. James C. Francis IV USM J

Honorable James C. Francis IV Page 2 June 17, 2005

The extension requested does not affect the discovery cutoff or any other deadline in this case, does not prejudice any defendant, and will provide plaintiff with sufficient time to respond to defendant's voluminous submissions. Accordingly, we respectfully request that the Court grant our request and permit our reply papers to be filed on Wednesday, June 22, 2005.

very truly yours,

Mitchell C. Stein

MCS:aef

cc: Counsel of Record (by e-mail)